



December 28, 2017

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

GN Docket No. 17-258

Dear Ms. Dortch;

SmartBurst LLC. is a fixed wireless Internet service provider (WISP) delivering high-speed Internet access to homes and businesses in North Texas and we are committed to providing fixed wireless access to more Americans.

Based in Aubrey, TX and founded in 2005 in order to provide fast reliable internet services to previous unserved and underserved areas. The SmartBurst service area in rural North Texas includes the Counties of Denton, Cooke, and Grayson as well as a few homes and businesses in the towns of Aubrey, Denton, Pilot Point, Sanger, Whitesboro, Collinsville, Valley View, Tioga and is actively expanding into other communities in the area. Currently the SmartBurst Internet service area is 413 square miles and the population within that area numbers nearly 35,000. Almost all of our customers are rural in nature and only a few are located in the incorporated areas or towns mentioned. We offer speeds up to 15mbps and are planning on deploying equipment capable of much faster speeds, however part of the challenge is we utilize spectrum that must be shared with other users including the 3650-3700 Mhz band. Our biggest challenge is having access to spectrum that is protected from interference where are users are located.

On October 24, 2017, the FCC released a Notice of Proposed Rulemaking (NPRM) that would fundamentally change the Citizens Broadband Radio Service (CBRS), which includes the 3550-3650 MHz band and the existing 3650-3700 MHz band.

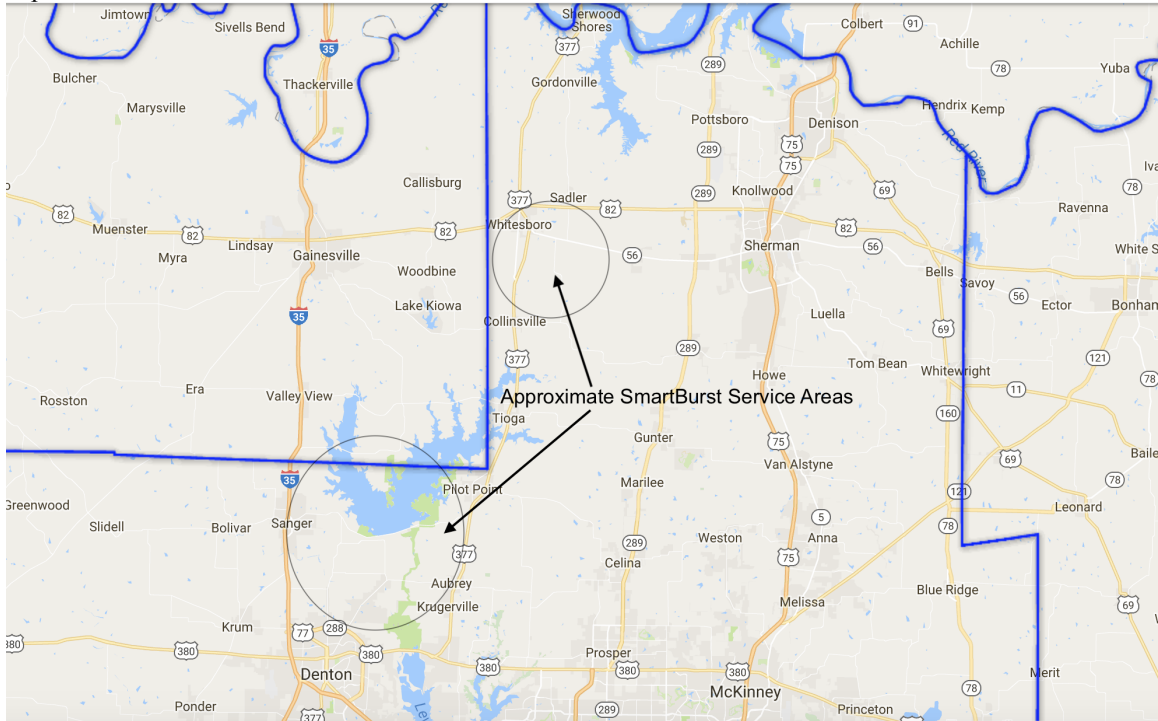
We have invested in and deployed equipment and currently provide services to users in the 3650-3700 Mhz band and SmartBurst had planned to continue to do so and to expand service offerings in the 3550-3650 band, however we have halted any future deployment in this mid band, due to the uncertainty brought about by the proposed rulemaking.

The demands of our customers will require additional access to more spectrum. As a small provider in a mostly rural area it is imperative that we have access to the CBRS band as the additional spectrum will allow us to provide even faster speeds to our customers.

The proposed rule changes would make the cost of acquiring protected Priority Access Licenses (PALs) through auction significantly higher, pricing out many small would-be bidders like SmartBurst and essentially ensuring that the large mobile wireless carriers have exclusive access to the spectrum for an indefinite period of time over a large geographic area. Smaller providers like SmartBurst, even if they had the means to outbid the large carriers, would be forced to acquire large-area licenses (multiple counties) that are likely much larger than the targeted areas SmartBurst and other WISPs would want to serve. In addition, the proposed rules that eliminate the GAA tier in the 3650-3700 MHz band without accommodating existing 3650-3700 MHz users and this could present serious interference problems if newcomers are not required to protect incumbents.

P.O. Box 677 Aubrey, TX 76227
940-239-0885

This map shows the current coverage area of our fixed wireless network with Partial Economic Areas depicted.



The proposed changes to the PAL rules are friendlier to national mobile carriers and if adopted, the proposed rules would effectively foreclose small companies like SmartBurst that wish to acquire protected spectrum for small areas and would create a “5G-only” band available only to the large mobile wireless providers.

SmartBurst opposes the proposed rulemaking. If adopted, the rules would seriously undermine our existing investment in 3650-3700 MHz and greatly inhibit our further investment and deployment in the entire 150 megahertz of spectrum and severely limit the benefits that were created in this band for rural broadband deployment.

We implore the FCC to save the 2015 CBRS Rules. Millions of American citizens living in rural and underserved areas served by small providers like SmartBurst must be afforded the same opportunity to receive fast, dependable Internet services, therefore we respectfully request that the Commission not adopt the proposed rules changing the CBRS.

Respectfully submitted,

Patricia

Patrick Parks
President
SmartBurst LLC.